

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Margaret Elisabeth Murley  
John Patrick Murley, Debtors**

**Case No. 20-50758-KMS  
Chapter 13**

**DEBTOR'S CERTIFICATION AND MOTION FOR ENTRY OF CHAPTER 13  
DISCHARGE PURSUANT TO 11 U.S.C. §1328 (a) and (h)**

**This motion seeks an order discharging the debtor(s) pursuant to § 1328(a) of the bankruptcy code. If you oppose this motion, you must file a response with the court within twenty-one (21) days from the date listed below in the certificate of service. Your response must set forth the specific factual allegations with which you disagree, and a copy of your response must be served on the debtor(s) and debtor's(s') attorney. If no timely response is filed, the court may grant this motion without holding a hearing. A timely response is necessary for a hearing to be held.**

1. By signing below, the debtors certify under penalty of perjury that the following statements are true and correct:
  - A. For cases filed on or after March 10, 2008, we have completed a personal financial management instructional course provided through an agency approved by the United States Trustee and have filed the certificate of completion provided by the course provider (in a joint case, both husband and wife must each complete the course and file a certificate of completion) or the approved personal financial management course provider has notified the court that we have completed a post-petition instructional course concerning personal financial management. **11 U.S.C. § 1328(g)**
  - B. All pre-petition amounts owed by me on domestic support obligation ("Domestic Support Obligation" as defined at 11 U.S.C §101(14A)), if any, have been paid to the extent provided by the plan. All post-petition amounts owed by me on a domestic support obligation, if any, have been paid. **11 U.S.C §1328(a)**
  - C. We have not received a discharge under chapter 7, 11 or 12 of the Bankruptcy Code in a prior case filed during the four-year period preceding the date that the petition was filed in this case. **11 U.S.C. §1328(f)(1)**
  - D. We have not received a discharge under chapter 13 of the Bankruptcy Code in a prior case filed during the two-year period before the date that the petition was filed in this case. **11 U.S.C. §1328(f)(2)**
  - E. We have not been convicted of a felony, the circumstances of which would demonstrate that the filing of this bankruptcy case constituted an abuse of the provisions of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(A)**
  - F. If we owe a debt arising from: (i) any violation of any State or Federal securities laws, regulations or orders, (ii) fraud, deceit or manipulation in a fiduciary capacity or in connection with the purchase or sale of any security, (iii) a civil remedy under 1964 of Title 18 of the United States Code, or (iv) that caused serious injury or death to another individual in the preceding five (5) years, in the preceding five (5) years, then we have not claimed an exemption for my/our residence in an amount in excess of the statutory

cap as prohibited by §522(q)(1) of the Bankruptcy Code. **11 U.S.C. §1328(h)(1) and §522(q)(1)(B)**

G. No proceeding is pending in which we may be found guilty of a felony of the kind described in §522(q)(1)(A) or in which we may be found liable for a debt of the kind described in §522(q)(1)(B). **11 U.S.C. §1328(h)(2)**

H. We have made all payments required by my confirmed Chapter 13 plan.

2. Debtors hereby move the court for the entry of a discharge order in this case.

Signed: <u>/s/ Margaret Elisabeth Murley</u>	<u>04-24-2025</u>
Margaret Elisabeth Murley	Date
 <u>/s/ John Patrick Murley</u>	 <u>04-24-2025</u>
John Patrick Murley	Date
 <u>/s/ Thomas C. Rollins, Jr.</u>	 <u>04-24-2025</u>
Thomas C. Rollins, Jr., MS Bar No. 103469	Date
Attorney for the Debtors	
The Rollins Law Firm, PLLC	
P.O. Box 13767	
Jackson, MS 39236	
601.500.5533	

3. Mailing address for filing responses:

Jackson Office:  
Danny L. Miller, Clerk  
United States Bankruptcy Court  
Thad Cochran US Courthouse  
501 E Court St, Ste 2.300  
Jackson, MS 39201

Gulfport Divisional Office:  
Danny L. Miller, Clerk  
United States Bankruptcy Court  
Dan M. Russell, Jr. U.S. Courthouse  
2012 15th St, Suite 244  
Gulfport, MS 39501

#### **CERTIFICATE OF SERVICE**

On April 24, 2025, a copy of this pleading was served on each of the persons listed on the attached service list either by prepaid United States mail or via electronic service through the Court's EM/ECF system at the mailing addresses and/or email addresses indicated.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

MARGARET ELISABETH MURLEY  
JOHN PATRICK MURLEY

CASE NO: 20-50758

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 4/24/2025, I did cause a copy of the following documents, described below,  
Notice and Motion for Entry of Chapter 13 Discharge

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 4/24/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

MARGARET ELISABETH MURLEY  
JOHN PATRICK MURLEY

CASE NO: 20-50758

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 4/24/2025, a copy of the following documents, described below,

Notice and Motion for Entry of Chapter 13 Discharge

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 4/24/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
NCRS ADDRESS DOWNLOAD  
CASE 20-50758  
SOUTHERN DISTRICT OF MISSISSIPPI  
THU APR 24 9-5-22 PST 2025

PHH MORTGAGE CORPORATION  
SHAPIRO MASSEY LLC  
1080 RIVER OAKS DRIVE SUITE B-202  
FLOWOOD MS 39232-7603

~~EXCLUDE~~

~~US BANKRUPTCY COURT  
DAN M RUSSELL JR US COURTHOUSE  
2012 15TH STREET SUITE 244  
GULFPORT MS 39501-2036~~

ASSOCIATED PATHOLOGIST  
PO BOX 530814  
ATLANTA GA 30353-0814

BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

BANK OF AMERICA NA  
P O BOX 982284  
EL PASO TX 79998-2284

BIENVILLE ORTHOPEDICS  
6300 E LAKE BLVD  
VANCLEAVE MS 39565-6770

CHASE CARD SERVICES  
PO BOX 15369  
WILMINGTON DE 19850-5369

CITIBANK  
PO BOX 6217  
SIOUX FALLS SD 57117-6217

COLLECTIONS INC  
PO BOX 6065  
GULFPORT MS 39506-6065

GULF SOUTH SURGERY CEN  
1206 31ST AVE  
GULFPORT MS 39501-1804

GULFPORT ANESTHESIA SE  
15190 COMMUNITY RD  
STE 230A  
GULFPORT MS 39503-3483

HEALTHCARE FINANCIAL A  
PO BOX 6410  
METAIRIE LA 70009-6410

JPMORGAN CHASE BANK NA  
SBMT CHASE BANK USA NA  
CO ROBERTSON ANSCHUTZ SCHNEID PL  
6409 CONGRESS AVENUE SUITE 100  
BOCA RATON FL 33487-2853

KEESLER FEDERAL CREDIT UNION  
PO BOX 7001  
BILOXI MS 39534-7001

LVNV FUNDING LLC  
RESURGENT CAPITAL SERVICES  
PO BOX 10587  
GREENVILLE SC 29603-0587

MARTIN LAKE RESORT  
PO BOX 1098  
OCEAN SPRINGS MS 39566-1098

MEMORIAL HOSPITAL  
4500 13TH STREET  
GULFPORT MS 39501-2569

MEMORIAL HOSPITAL  
PO BOX 15579  
HATTIESBURG MS 39404-5579

MERIT HEALTH BILOXI  
PO BOX 281436  
ATLANTA GA 30384-1436

ORANGE GROVE URGENT  
10556 HWY 49  
GULFPORT MS 39503-4109

PHH MORTGAGE CORPORATION  
ATTN BANKRUPTCY DEPARTMENT  
PO BOX 24605  
WEST PALM BEACH FL 33416-4605

PARAGON REVENUE GROUP  
P O BOX 127  
CONCORD NC 28026-0127

PATIENT ACCOUNT SERVIC  
PO BOX 1022  
WIXOM MI 48393-1022

PAUL MATHERNE MD PC  
180 DEBUYS RD  
B223  
BILOXI MS 39531-4402

(P)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

PRIMELENDING  
18111 PRESTON RD  
DALLAS TX 75252-6601

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

ROOMS TO GO  
10325 US 49  
STE A  
GULFPORT MS 39503-4101

SHAPIRO BROWN LLC  
BEHALF OF PHH MORTGAGE CORPORATION  
1080 RIVER OAKS DRIVE SUITE B-202  
FLOWOOD MS 39232-7603

SIMONE ASSOCIATES  
10585 THREE RIVERS RD  
STE C  
GULFPORT MS 39503-3572

SYNCHRONY BANK  
PO BOX 965028  
ORLANDO FL 32896-5028

TD RETAIL CARD SERVICES  
CO CREDITORS BANKRUPTCY SERVICE  
PO BOX 800849  
DALLAS TX 75380-0849

UMMC  
PO BOX 3488  
DEPT 05-077  
TUPELO MS 38803-3488

~~EXCLUDE~~

~~UNITED STATES TRUSTEE  
501 EAST COURT STREET  
SUITE 6430  
JACKSON MS 39201-5022~~

JOHN PATRICK MURLEY  
433 MCGUIRE CIRCLE  
GULFPORT MS 39507-3900

## DEBTOR

MARGARET ELISABETH MURLEY  
433 MCGUIRE CIRCLE  
GULFPORT MS 39507-3900

~~EXCLUDE~~

~~THOMAS CARL ROLLINS JR  
THE ROLLINS LAW FIRM PLLC  
PO BOX 13767  
JACKSON MS 39236-3767~~

~~EXCLUDE~~

~~(P) WARREN A CUNTZ T1 JR  
PO BOX 3749  
GULFPORT MS 39505-3749~~